



**U.S. EQUAL EMPLOYMENT OPPORTUNITY COMMISSION**  
**New York District Office**

33 Whitehall Street, 5<sup>th</sup> Floor  
New York, NY 10004-2112

January 17, 2025

**VIA ECF**

The Honorable Robert W. Lehrburger  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

So ordered. The case is stayed until March 14, 2025. If settlement, or substantial progress toward settlement, is not reached by that date, the Court will not be inclined to grant another stay.

Re: EEOC v. Hillstone Restaurant Group, Inc.  
Case No. 1:22-cv-03108-JLR-RWL

SO ORDERED:

1/17/2025

HON. ROBERT W. LEHRBURGER  
UNITED STATES MAGISTRATE JUDGE

Dear Judge Lehrburger:

The EEOC writes on behalf of both parties to jointly request that the current stay of all deadlines (ECF No. 82) be extended by an additional two months to allow the parties to continue to attempt to reach a settlement of this lawsuit.<sup>1</sup>

Since the entry of the second stay of discovery (ECF No. 82) on November 13, 2024, the parties have continued to work diligently and cooperatively to try to resolve this matter but have not reached a settlement. The parties have therefore agreed that, to speed negotiations and reduce the likelihood of needing to request any further extensions of the stay, each party will provide a detailed substantive written response within two weeks of receiving the other's party's latest proposal.

Accordingly, we respectfully request that the Court stay all deadlines—including fact discovery—up until and including March 14, 2025, to allow for continued meaningful settlement discussions. The parties also ask to submit a joint status report within five days of settlement or March 17, 2025, whichever comes first.

Thank you for your time and attention to this matter.

Respectfully submitted,

/s/Daniel Seltzer

Daniel Seltzer  
Trial Attorney  
EQUAL EMPLOYMENT  
OPPORTUNITY COMMISSION  
33 Whitehall Street, 5th Floor

---

<sup>1</sup> The Court's Order (ECF No. 82) extended the stay until January 17, 2025 and set a January 21, 2025 deadline for a status report. The parties ask that this letter request for an extension of the stay be treated as that status report.

New York, NY 10004  
Tel.: (929) 506-5308  
Daniel.seltzer@eeoc.gov